

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JI GUO WU, SHOUHUI YANG, )  
XIUJU DENG, CHUNYANG CAI, )  
CUIMIN TIAN, SUHONG YANG, )  
ZHEN LEI, XINBIN TIAN, )

Plaintiffs, )

v. )

EAST OCEAN AGRICULTURE CORP., )  
and XIANDONG SHI, )

Defendants. )

C.A. No. 1:21-cv-0668 RGA

**STIPULATION TO EXTEND DEADLINES IN SCHEDULING ORDER**

The parties, through their respective attorneys, stipulate as follows:

WHEREAS the Scheduling Order for this case was issued on April 6, 2022;

and

WHEREAS proceedings in this case have taken longer than the parties anticipated when they proposed deadlines for the Scheduling Order; and

WHEREAS the parties require additional time to complete discovery and for dispositive motions;

NOW THEREFORE, the parties agree and propose that the following deadlines be substituted for the dates in the Scheduling Order. None of the proposed deadlines affects the May 5, 2023 date for the pretrial conference:

1. Fact discovery shall be completed by October 3, 2022.
2. Document production shall be substantially complete by September 2, 2022.

3. Initial disclosure of expert testimony shall be made by October 17, 2022.
4. Rebuttal expert disclosure shall be made by November 21, 2022.
5. Any expert depositions shall be taken no later than December 9, 2022.
6. All papers in support of dispositive motions shall be filed and served on or before January 6, 2023, and no dispositive motion under Rule 56 may be filed more than 10 days before this date without leave of the Court.
7. Depositions now scheduled will be rescheduled.

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*Attorneys for Plaintiff Ji Guo Wu*

Dated: August 2, 2022

**IT IS SO ORDERED**, this \_\_\_\_\_ day of August, 2022.

\_\_\_\_\_  
Judge Richard G. Andrews